

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

LEAGUE OF UNITED LATIN AMERICAN CITIZENS, <i>et al.</i>	§	
	§	
<i>Plaintiffs,</i>	§	Case No. 3:21-cv-00259
V.	§	[Lead Case]
	§	
GREG ABBOTT, <i>et al.</i> ,	§	
	§	
<i>Defendants.</i>	§	
	§	
TEXAS STATE CONFERENCE OF THE NAACP,	§	
	§	
	§	
<i>Plaintiff,</i>	§	Case No. 1:21-cv-01006
V.	§	[Consolidated Case]
	§	
	§	
GREG ABBOTT, <i>et al.</i> ,	§	
	§	
<i>Defendants.</i>	§	
	§	

PLAINTIFF TEXAS NAACP'S NOTICE OF SUBMISSION OF EXPERT REPORTS

Pursuant to the Court's Supplemental Pretrial Scheduling Order dated May 1, 2025 (Dkt. 921), Plaintiff Texas NAACP hereby submits the expert reports that it intends to affirmatively rely on and submit as evidence at the upcoming trial in the above-captioned matter, scheduled to commence on May 21, 2025. The expert reports attached to this submission are as follows:

- Attachment A: Moon Duchin Initial Expert Report, dated May 23, 2022
- Attachment B: Moon Duchin Supplemental Expert Report, dated June 20, 2022
- Attachment C: Moon Duchin Rebuttal Expert Report, dated August 1, 2022
- Attachment D: Muñoz Martinez Expert Report, dated May 20, 2022

Consistent with the Court's Order, color copies of the above-referenced expert reports were delivered to the chambers of each judge on May 2, 2025.

Respectfully submitted,

/s/ Lindsey B. Cohan

Lindsey B. Cohan
Texas Bar No. 24083903
DECHERT LLP
515 Congress Avenue, Suite 1400
Austin, TX 78701
(512) 394-3000
lindsey.cohan@dechert.com

David Rollins-Boyd*
Jennifer Nwachukwu*
Jeremy Lewis*
LAWYERS' COMMITTEE FOR
CIVIL RIGHTS UNDER LAW
1500 K Street, Suite 900
Washington, DC 20005
(202) 662-8600
drollins-boyd@lawyerscommittee.org
jnwachukwu@lawyerscommittee.org
jlewis@lawyerscommittee.org

Neil Steiner*
DECHERT LLP
1095 Avenue of the Americas
New York, NY 10036
(212) 698-3822
neil.steiner@dechert.com

Robert Notzon
Texas Bar No. 00797934
THE LAW OFFICE OF ROBERT NOTZON
1502 West Avenue
Austin, Texas 78701
(512) 474-7563
robert@notzonlaw.com

Gary Bledsoe
Texas Bar No. 02476500
THE BLEDSOE LAW FIRM PLLC
6633 Highway 290 East #208

Austin, Texas 78723-1157
(512) 322-9992
gbleedsoe@thebledsoelawfirm.com
Attorney only as to Texas NAACP's claims
related to Texas state senate and state house
plans

Anthony P. Ashton*
NAACP OFFICE OF THE GENERAL COUNSEL
4805 Mount Hope Drive
Baltimore, MD 21215
(410) 580-577
aashton@naacpnet.org

Janette M. Louard
NAACP OFFICE OF THE GENERAL COUNSEL
4805 Mount Hope Drive
Baltimore, MD 21215
(410) 580-577
jlouard@naacpnet.org
Attorneys appearing of counsel

*Admitted *pro hac vice*.

ATTORNEYS FOR THE TEXAS STATE
CONFERENCE OF NAACP

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing and all attachments was filed and served via the Court's electronic filing system on May 2, 2025.

s/Lindsey B. Cohan
Lindsey B. Cohan
Counsel for Plaintiff Texas NAACP